Mirror Polishing & Plating Co., Inc.
Roll Surface Engineering

MPP

March 10, 2006

VIA FEDERAL EXPRESS
Susann D. Nachmann, Environmental Engineer
RCRA Compliance Unit (Mail Code SER)
Office of Environmental Stewardship
United states Environmental Protection Agency
1 Congress Street, Suite 1100
Boston, Massachusetts 02203-2211

Re: Request for Information Pursuant to Section 3007 of RCRA (Mirror Polishing and Plating Company, Inc.)

Dear Ms. Nachmann:

The following materials are provided in response to your agency's letter to me dated February 17, 2006 with regard to financial assurance for the closure/post closure of our former RCRA surface impoundment. Attached you will find the following documents: (1) our responses to your agency's questions, (2) my certification with regard to the information in those responses, (3) a table cross referencing the documents I have attached to our responses with the questions in your letter and (4) sixteen exhibits that apply to our responses.

Please let me know if you have any questions concerning our responses to your agency's questions or the documents appended to those responses. You can reach me at (203) 574-5400.

Sincerely yours,

Richard A. DuPont
Vice President

Enclosures
Cc: Robert Isner (CTDEP)

346 Huntingdon Avenue • P.O. Box 1484 • Waterbury, CT 06721-1484
(203) 574-5400 • Fax (203) 597-9448
website: www.mpp.net • email: chromerolls@mpp.net

Responses to EPA Requests for Information
for the
Mirror Polishing and Plating Company, Inc.
346 Huntingdon Avenue
Waterbury, Connecticut 06708

The following information is provided in response to the questions in Attachment 1 of the EPA letter to Mirror Polishing and Plating Company, Inc. ("MPP") which is dated February 17, 2006. The paragraph numbers below correspond to the paragraph numbers in Attachment 1.

1. MPP is the current owner/operator of its facility at 346 Huntingdon Avenue, Waterbury, Connecticut 06708.

2.a. Mirror Polishing and Plating Company, Inc.

2.b. CTD001166263.

2.c. 346 Huntingdon Avenue, Waterbury, Connecticut 06708.

2.d. Interim Status.

2.e. There was a former surface impoundment at our facility that was clean closed during 1984. See the August 2004 Closure Plan, the 1985 Certification of Surface Impoundment Closure, the CTDEP October 30, 1985 letter (which conditionally approved the 2004 Closure Plan and CTDEP Order HM-286 attached at Tabs 1, 2, 3 and 4 below respectively. The CTDEP Closure Approval Letter (Tab 3) conditioned final closure of that unit upon the performance of up to 30-years of groundwater monitoring under the order at Tab 4. We understand that to mean that the former surface impoundment will be considered closed when we complete what would otherwise be 30 years of post closure groundwater monitoring.

2.f. Metal hydroxide sludge was stored in Hazardous the former surface impoundment before it was closed during 1984.

2.g. We estimate that approximately 42,000 gallons of sludge (5% to 8% solids) were placed into the former surface impoundment on an annual basis before it was closed during 1984. Page 8 of the Closure Plan (Tab 1) provides that 211 cubic yards of sludge and contaminated soil were removed from the that impoundment when it was closed during 1984.

2.h. The closure cost estimates for the former surface impoundment in 1984 dollars were at Table 2 of the 1984 Closure Plan (Tab1). Those costs ($93,317 in 1984 dollars) were incurred during the 1984 closure of that impoundment. There are no other TSD units at our facility that are subject to TSD closure.

2.i. We estimate that our post closure costs for the former surface impoundment will be less than $28,000 for the reasons set out below.

Our company has performed RCRA post closure groundwater monitoring for the 1984 closure of the former surface impoundment for the past twenty-one years under an April 1984 plan entitled "Groundwater Monitoring, Sampling and Analysis Plan (Tab 5). The CTDEP approved that groundwater monitoring plan by its letter dated May 17, 1984 (Tab 6). Post closure ground water monitoring was initiated for the closure of the former surface impoundment during 1984 pursuant to that plan and a 19854 report entitled "Report on Groundwater Monitoring Well Installation, Sampling and Analysis (Tab 7). One up gradient (MW-1) and two down gradient wells (MW-2 and MW-3) were installed for post closure monitoring until a fourth well was installed within the footprint of the former surface impoundment during 1990 (MW-13). Appendix C of this report shows initially downward and then stabilizing trends for hex-chrome between January 1989 and January 2006.

Appendix C to the 2005 Annual RCRA groundwater monitoring report (Tab 8) shows downward and then stabilizing trends with regard to total chromium and hex-chromium in wells MW-1, MW-2, MW-3 and MW-13 between June 1984 and January 1998. Appendix C of the 2006 report shows the hex-chrome trends for the years from 1990 to 2006 which are not depicted in the 2005 . Both of those reports show that the ground water contamination in those wells has been naturally attenuating.

We have been investigating other locations of our property since 1998 under the supervision of the Connecticut Department of Environmental Protection to determine the degree and extent of groundwater, soil and soil vapor contamination across the site due to historic operations of the companies that owned the property before we did (Tab 8 at page 2). While the information developed as part of our RCRA closure/post closure work has been used as part of that site-wide investigation, the site-wide investigation has been performed outside a RCRA post closure context. That investigation has involved the installation of 26 additional groundwater monitoring during 1999, soil sampling and a soil vapor survey. At least two other sources of historic hex-chromium contamination have been located on-site in close proximity of the former surface impoundment. We believe that some if not all of the hex-chrome contamination that is now in site soil/groundwater is from those other sources. One of those sources are documented in a 1931letter which shows that there was chromic acid in site groundwater sufficient to "eat up a pump" in an on-site well (Tab 9). That contamination was attributable to historic operations at the site during and/or prior to 1931. It is our understanding that the former surface impoundment at the site was not installed until the 1970s.

Appendix C to the January 2006 semi-annual RCRA groundwater monitoring depicts the groundwater monitoring trends for wells MW-1, MW-2, MW-3 and MW-13 for the period between January 1989 and January 2006 (Tab 10). Those trends are consistent with the downward/stabilizing trends shown in the 2005 report.

Our post closure RCRA groundwater monitoring, analysis and reporting costs for wells MW-1, MW-2, MW-3 and MW-13 have been $2,900 per year for the past several years. See HRP invoices at Tabs 11, 12 and 13. Since we anticipate that we will be performing another nine years of RCRA post closure ground water monitoring pursuant to the CTDEP October 30, 1985 letter (Tab 3), we estimate that the costs for that monitoring will be less than $28,000, even allowing for inflation.

2.j. We have used and are using an irrevocable letter of credit in the favor of the CTDEP Commissioner for post closure costs.

2.k. A copy of our current Fleet National Bank letter of credit is at Tab 14.

2.l. We were required to have financial assurance for the closure/post closure of the former surface impoundment as of the effective date of 40 CFR § 265.143 which we understand was some date after April 7, 1982.

2.m. We obtained our first letter of credit from the Colonial Bank on July 8,1986.

2.n. Fleet National Bank provides our current RCRA post closure letter of credit. It is the amount of $50,000. Fleet's address is P.O. Box 2197 MA ML SFTINT, Boston, Massachusetts 02106-2197.

2.o. We have used the Fleet letter of credit described above as well as a prior Colonial Bank letter of credit to satisfy our RCRA post closure financial assurance requirements. Our closure requirements were completed during 1984. A copy of the prior Fleet letter of credit is at Tab 15.

2.p. Since we closed our former surface impoundment for storage of hazardous wastes during 1984 and since we have not used it for that purpose since, it is not possible to have a sudden event which causes third party liability. We do not have insurance for either a sudden or a non-sudden release for our closed impoundment.

3. We have not used corporate guarantee as a financial assurance mechanism.

4. We have not been notified by either the CTDEP or the USEPA that our former surface impoundment is out of compliance with applicable financial assurance requirements with the past five years.

5. Our environmental consultant prepared a written adjustment to our 1984 closure plan to document the costs for the closure work was performed during 1984 which is dated October 25, 1984 (Tab 16). We do not have a later closure cost estimate because our surface impoundment was clean closed during 1984. As previously noted, the CTDEP approved our August 1984 closure plan of our only TSD unit as amended by the October 25, 1984 letter identified immediately above by its letter dated October 30, 1984 (Tab 3).

We have revised our post closure groundwater monitoring estimate annually by simply estimating the cost to perform that work for the remaining years up to thirty years of post closure groundwater monitoring. We anticipate that we have 8.5 years to go. We know that the annual cost of doing that monitoring is and has been $2,900 annually for the past several years (Tabs 11, 12 and 13) and we anticipate that will be the approximate cost for the next several years. We have compared the projected costs to complete a total of up to thirty years of post closure groundwater monitoring at our facility (now approximately $24,650) with the value of our letter of credit ($50,000) and have found the latter sufficient to cover those costs (including any reasonably increases due to inflation that might added to those costs). We have not prepared written adjustments to our post closure cost estimates because we have made the foregoing annual calculations mentally.

6. We believe that we should no longer be subject to RCRA closure financial assurance because we closed our former surface impoundment twenty-one years ago, subject only to our performing thirty years of RCRA post closure groundwater monitoring, and because we have performed twenty-one years of RCRA post closure groundwater monitoring for our former surface impoundment. Our 2005 annual report and our January 2006 semi-annual reports (Tabs 8 and 10) show the results of the past twenty one years of RCRA post closure groundwater monitoring for our former surface impoundment.

7. We believe that our letter of credit only applies to RCRA post closure financial assurance requirements because the CTDEP approved the closure of our former surface impoundment twenty-one years ago, subject only to our performing thirty years of RCRA post closure groundwater monitoring, and because we have now completed over twenty-one years of RCRA post closure groundwater monitoring for our former surface impoundment to date.

8. As noted above, we closed our surface impoundment during 1984 and are in our twenty second year of post-closure groundwater monitoring. We adjusted our closure cost estimate right after we closed the surface impoundment by showing the cost of the work completed. As noted above, the CTDEP approved that closure. Since we believe that we do not have to perform any more closure activities, we have not adjusted our closure cost estimate since 1984. We have compared the projected costs to complete a total of up to thirty years of post closure groundwater monitoring at our facility with the value of our letter of credit and have found the latter sufficient to cover those costs including any reasonably anticipated inflation that might added to those costs. See our response to question 5 above for our explanation of how we have made of post closure cost estimates for the past several years.

Attachment 3

INFORMATION REQUEST

Mirror Polishing and Plating Company, Inc.
346 Huntington Avenue
Waterbury, CT 06708

The following form of certification must accompany all information submitted by Mirror Polishing and Plating in response to the Information Request.

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Information Request) and all documents submitted herewith; that the submitted information is true, accurate and complete; and that all documents submitted herewith are complete and authentic, unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

Executed on MARCH 10, 2006

Signature

RICHARD DuPONT
Type Name

VICE PRESIDENT/GM
Title [if any]

Mirror Polishing and Plating Company, Inc. ("MPP") Exhibit Cross-Reference Table		
1.	MPP Hazardous Waste Closure Plan (8/84)	2e, 2g, 2h
2.	MPP Closure Certification (3/15/85)	2e
3.	CTDEP Approval of MPP Closure Plan (10/30/85)	2e, 2i, 5
4.	CTDEP Order # HM-286 (10/3/85)	2e
5.	MPP Groundwater Monitoring Plan (4/84)	2i
6.	CTDEP Approval of MPP Groundwater Monitoring Plan (5/84)	2i
7.	MPP GW Monitoring Report (1984)	2i
8.	MPP 2005 GW Monitoring Report (2/22/06)	2i, 6
9.	Stephen B. Church Co. Letter (5/8/31)	2i
10.	MPP January 2006 GW Monitoring Report (2/22/06)	2i, 6
11.	HRP GW Monitoring Invoice (3/19/03)	5
12.	HRP GW Monitoring Invoice (9/16/04)	5
13.	HRP GW Monitoring Invoice (2/10/05)	5
14.	Fleet Bank Letter of Credit (6/29/00)	2k
15.	Colonial Bank Letter of Credit (7/8/86)	2o
16.	HRP Closure Cost report (10/25/84)	5

HAZARDOUS WASTE CLOSURE PLAN

M P & P INCORPORATED
346 HUNTINGDON AVENUE
WATERBURY, CONNECTICUT

CTD 001166263
HRP #84-08-10

AUGUST, 1984

Submitted to:

Ms. Nancy Dvilinskas
M P & P Incorporated
P.O. Box 1484
346 Huntingdon Avenue
Waterbury, Connecticut

Submitted by:

HRP Associates, Inc.
Engineering and Geology
P.O. Box 732
28 Park Place
New Britain, Connecticut

TABLE OF CONTENTS

HAZARDOUS WASTE CLOSURE PLAN

M P & P Incorporated
346 Huntingdon Avenue
Waterbury, Connecticut

CTD 001166263
HRP #84-08-10

1.0 INTRODUCTION

In accordance with RCRA regulations contained in 40 CFR Parts 265.111 through 265.115 (General Closure Requirements and Subparts I and J (Specific Facility Requirements), and analagous State regulations, all owners and operators of hazardous waste facilities must close their facilities in a manner that:

- Minimizes the need for further maintenance; and
- Controls, minimizes or eliminates, to the extent necessary, post-closure release of hazardous waste to ground waater, surface water or the atmosphere.

The Closure Plan must include, at a minimum:

- A description of how and when the facility will be partially closed and ultimately closed;
- An estimate of the maximum inventory of wastes in storage or treatment at any given time;
- A description of the steps needed to decontaminate facility eqiupment during closure; and
- A schedule for final closure.

In subsequent sections, this Closure Plan provides specific information and procedures for the closing of the metal hydroxide sludge drying lagoon at the M P & P facility.

This Plan also provides a description of general methods to be applied, along with precautions to be taken in closing hazardous waste facilities and the maximum waste inventory.

2.0 CLOSURE PLAN FOR LAGOON STORAGE

- EPA I.D. Number: CTD 001166263
- Owner/Operator: M P & P Incorporated
- Plant Phone: (203) 574-5400
- Facility Address: 346 Huntingdon Avenue
  Waterbury, Connecticut

2.1 Facility Description

The M P & P facility is located on the south side of Huntingdon Avenue in Waterbury, Connecticut, as shown on Figure 2-1. The facility occupies a parcel of approximately 4.5 acres in area which contains both office and plating operations.

One sludge drying lagoon is located immediately adjacent to the west central portion of the plant building, as shown on Figure 2-2.

The lagoon is bounded on three sides by the exterior foundation and walls of the plant building and on the fourth by a chain-link fence. The fence separates the lagoon from a paved area which adjoins the west side of the plant.

In the past the lagoon has been used for storage of metal hydroxide sludges generated by the M P & P plating process. As an operational consideration and as a reslt of increasing regulatory emphasis on the storage and disposal of metal hydroxide wastes, M P & P has decided to eliminate use of the lagoon. As an

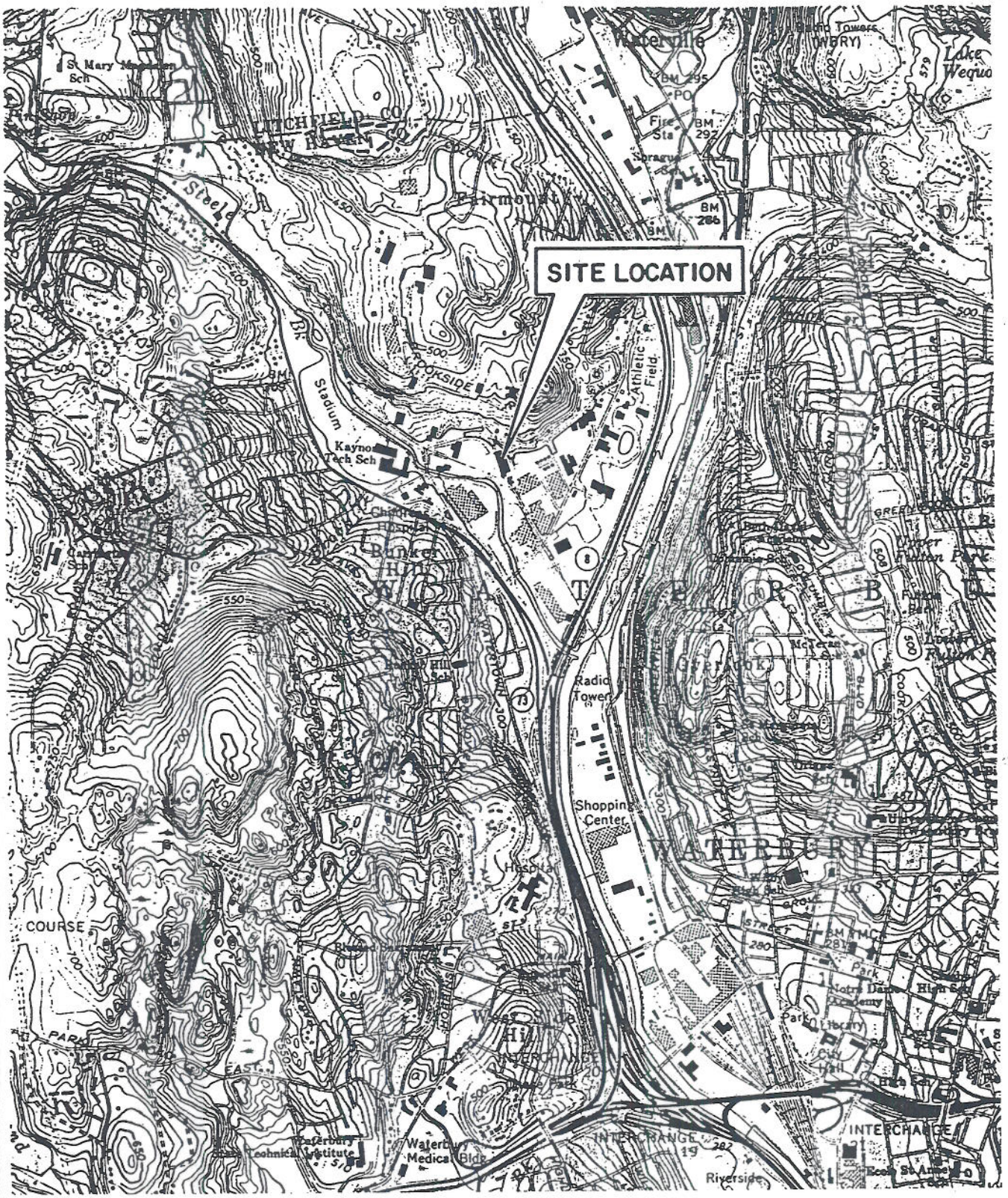


FIGURE 2-1
SITE LOCATION
MP&P, INC.
WATERBURY, CONN.
NTS HRP NO. 84-08-10
hrp associates inc.

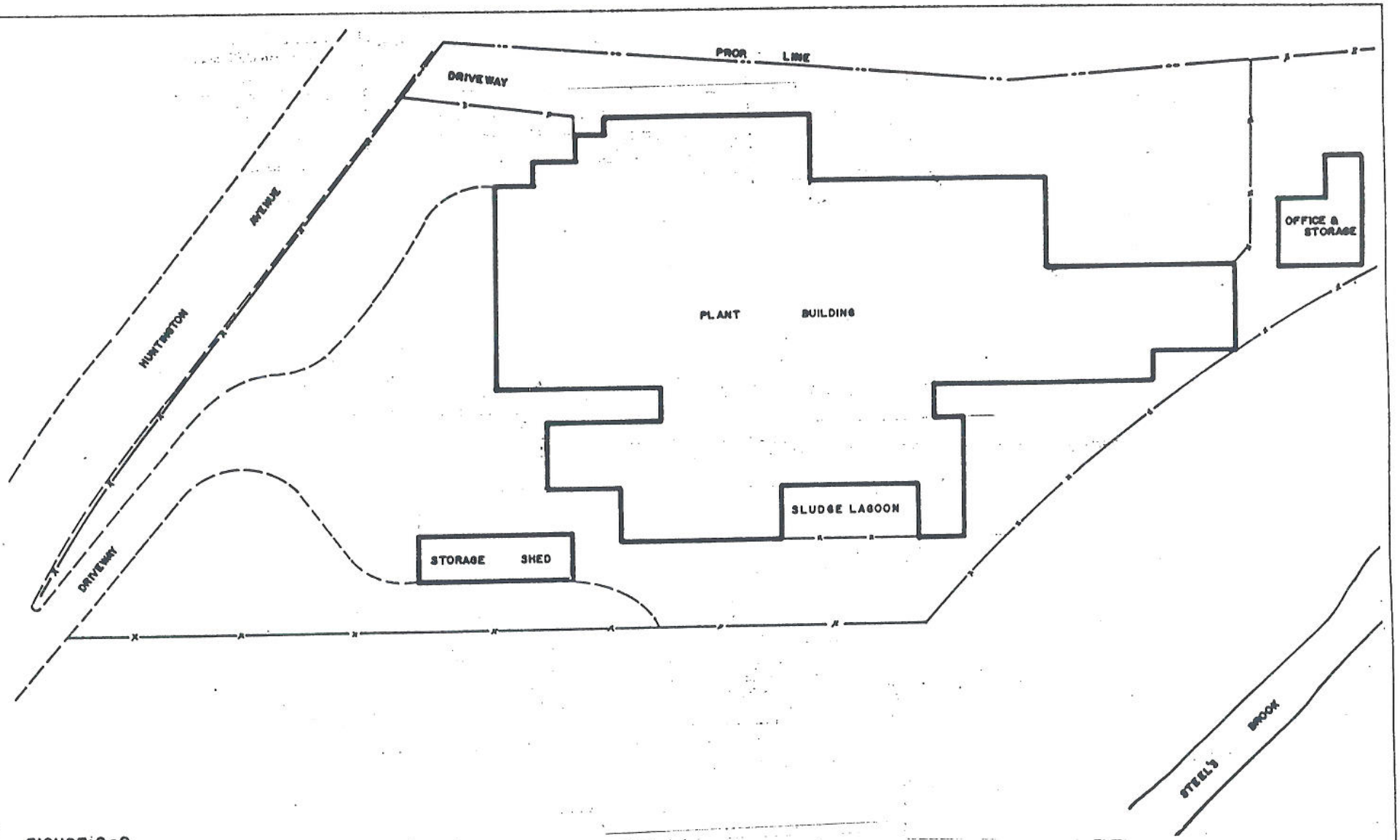


FIGURE 2-2
SITE LOCATION
MP&P, INC.
WATERBURY, CONN.
BTS HRP NO. 84-08-10

alternative, Stanblex Canada, Inc. has been contracted to provide for the removal and disposal of all sludges generated by the facility.

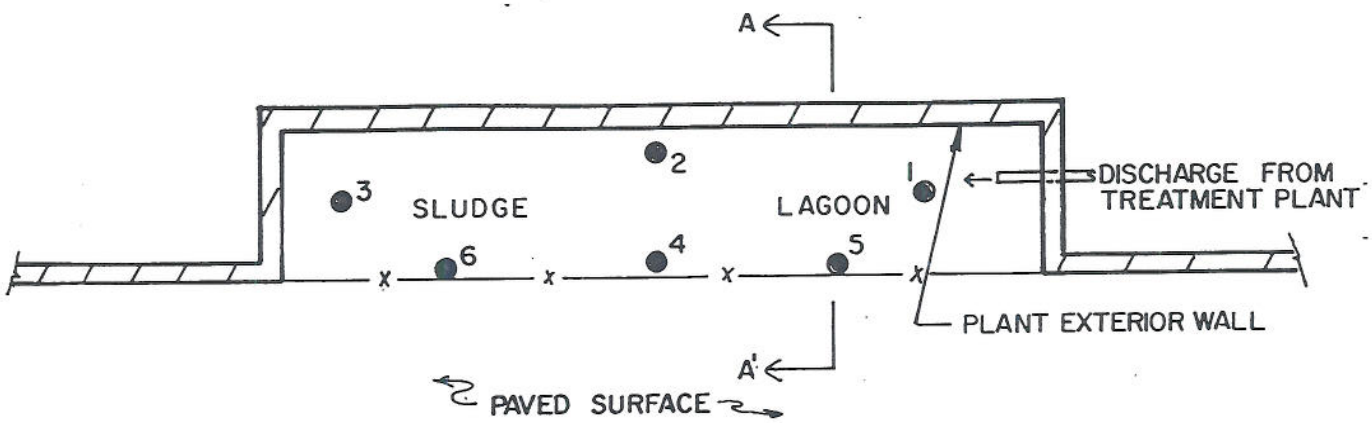
All sludges will be transferred to air-tight containers following processing through the plant's waste treatment system. The containers will be removed by Sealand Environmental Services, Inc., a Connecticut licensed waste hauler, and delivered to the Stablex facility in Ste-Therese-De-Blainville, Quebec, Canada.

2.2 Lagoon Description

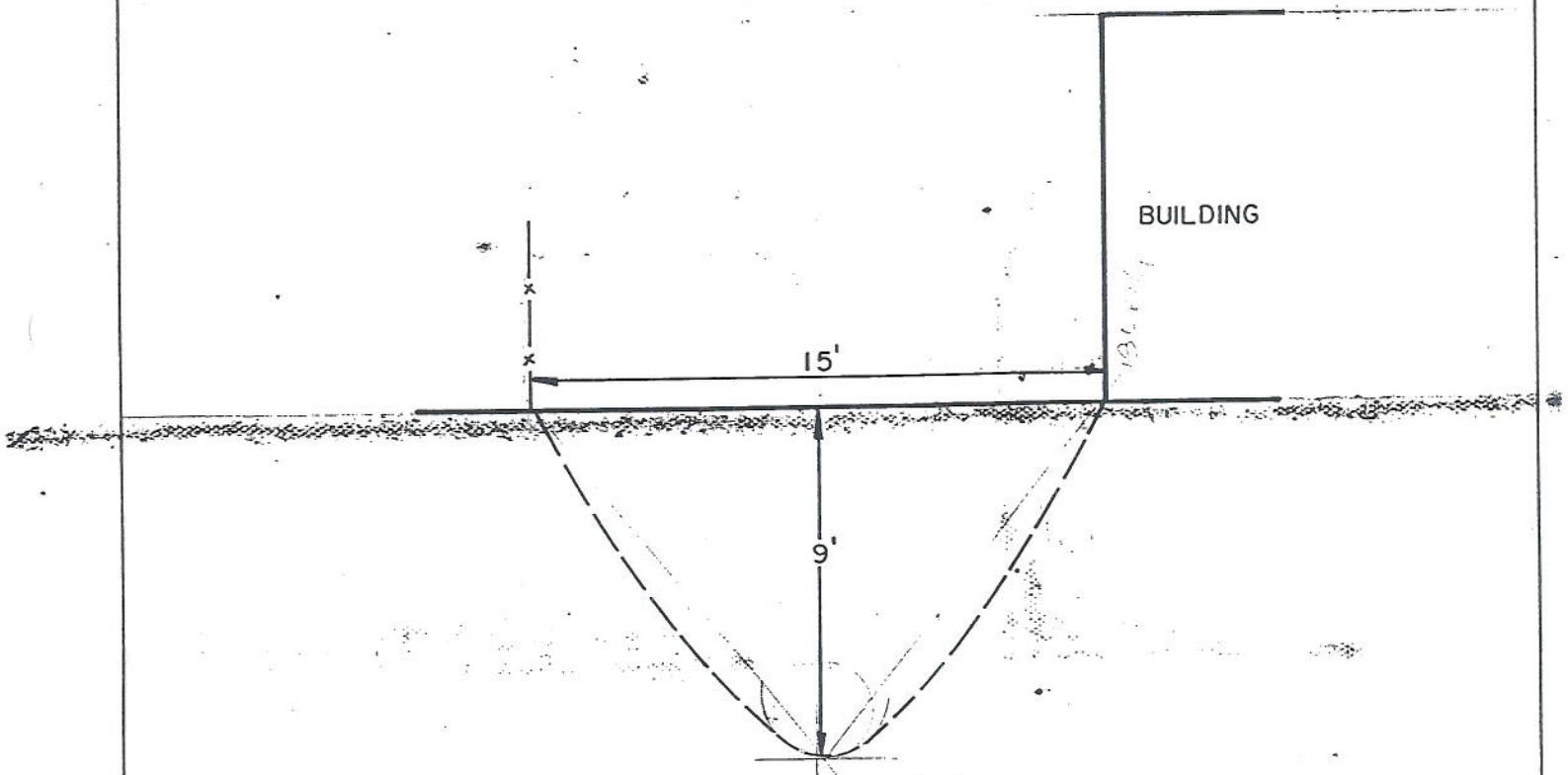
The metal hydroxide storage lagoon at M P & P Incorporated was used as the final dewatering step in the plant's waste water treatment system. The lagoon is approximately 80 feet long and 15 feet wide at surface. The maximum working depth varies from 8 to 9 feet. Details of the lagoon are shown on Figure 2-3.

2.3 Waste Description

Closure of the dewatering lagoon at M P & P Incorporated will result in the generation of minor amounts of metal hydroxide sludge and contaminated soil. Results of EP Toxicity tests of both sludge and soil taken in January, 1984, and February, 1984, respectively, are included in Appendix A of this report.



PLAN VIEW
1"=20'



SECTION A'-A
1"=5'
NOTE: DEPTH VARIES

● SOIL SAMPLE LOCATION

FIGURE 2-3
SLUDGE LAGOONS
MP & P, INC.
WATERBURY, CONN.

HRP NO. 84-08-11

As indicated by the analyses, the sludge is primarily composed of hydroxides of the following metals: chrome, nickel, and copper. It also contains minor amounts of barium and lead.

Treatment of the waste waters generated at the plant prior to entering the lagoon include: pH adjustment with sulfuric acid and addition of caustic soda and flocculant to precipitate metal hydroxides. As a final step prior to discharge to the lagoon, metal hydroxides are allowed to settle out in a settling tank. Sludges and waste waters are discharged to the lagoon.

After entering the lagoon, the sludge is further dewatered with the resultant solids contents approximately 40-60%.

2.4 Waste Volume

In January, 1984, M P & P initiated the removal of sludges and soil from the lagoon. The volume of sludge and soil removed from the lagoon during the course of removal operations, to date, was approximately 211 cubic yards.

All sludge and soils which were removed have been shipped to the Stablex, Canada facility previously mentioned.

The results of sampling at the locations shown on Figure 2-4 (Appendix B) indicate all EP Toxic metals to be either absent or below ten (10) times Department of Health Services (DOHS) Drinking Water Standards.

2.5 Closure Procedures

Closure of a surface impoundment can be accomplished in three (3) alternative ways:

Alternative 1: Removal of standing liquids, waste and waste residue, the liner (if any), and underlying soil;

Alternative 2: Demonstration that the wastes in the lagoon are not hazardous under 261.3c and 261.3d; or

Alternative 3: Retention of the hazardous waste material in the lagoon as specified for landfills under subparts G and 265.310 of 40 CFR.

The option chosen for the closure of the M P & P lagoon was Alternative 1. Selection of this option required removal of residual soils, as necessary.

The following procedures were followed in closing the lagoon:

Step 1: All sludge and contaminated soil was excavated.

Step 2: Excavated soils were placed into containers.

Step 3: Containers were transported to the Stablex, Canada facility for disposal.

Step 4: Soil samples were collected from the bottom and sides of the excavation.

Step 5: The excavated pit was backfilled with clean fill. After a period of settling or machine compaction, the surface will be covered with bituminous pavement.

Step 6: All excavation equipment was swept or scraped clean and materials generated were added to the final load of contaminated soil and sludge.

All contaminated soils were manifested and shipped to Stablex by Sealand Environmental Services, Inc.

3.0 CLOSURE SCHEDULE

The M P & P lagoon facility was closed in June, 1984. Paving of the filled surface will be completed after the fill has been allowed to settle.

4.0 GROUND WATER MONITORING

A ground water monitoring sampling and analysis plan has been prepared for the M P & P facility. It was described in a report dated April, 1984, which was submitted to the Connecticut Department of Environmental Protection (DEP), and approved for implementation on May 17, 1984. The report contains pertinent information on site geology, hydrogeology, ground and surface water use and well design. Monitoring well locations are shown in Figure 4-1.

It is anticipated that the ground water monitoring system will continue to be monitored quarterly, as necessary.

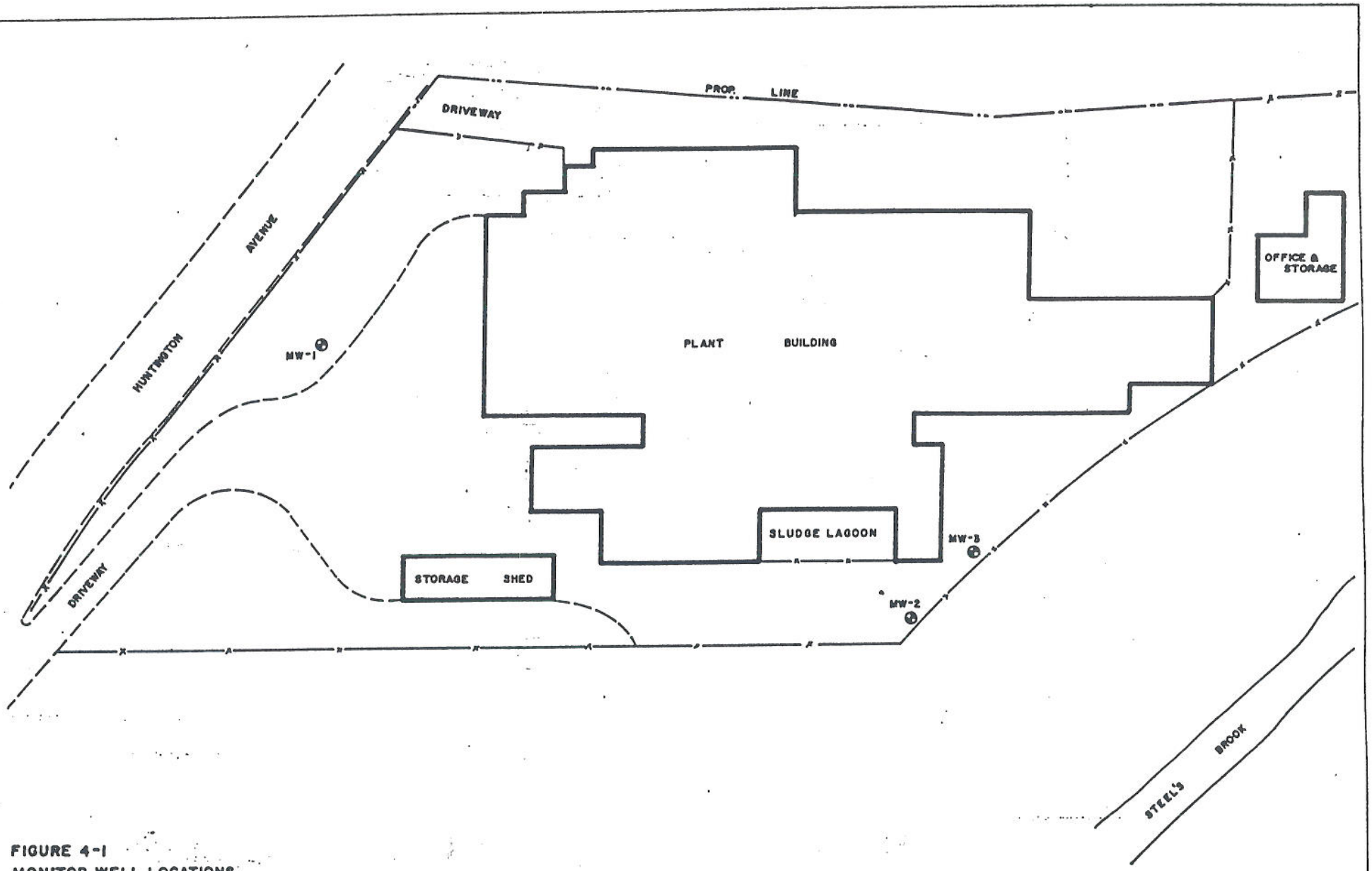


FIGURE 4-1
MONITOR WELL LOCATIONS
M P & P, INC.
WATERBURY, CONN.
NTS HRP NO. 84-08-10

5.0 COST ESTIMATE

Closure costs in Summer, 1984 dollars are shown on Table 2. Cost estimates are based on:

1. In-house labor at $200/manday

2. Removal and disposal of contaminated soils at the following rates:

   - contaminated soil $130/cubic yard
   - excavation $120/hour

3. Placement of fill $8.00/cubic yard

6.0 CERTIFICATION

Certification is required at the completion of closure. A licensed professional engineer must provide the required certification. Accordingly, the following certification will be submitted to the Connecticut Department of Environmental Protection upon completion of closure.

I, _____, for M P & P Incorporated, 346 Huntingdon Avenue, Waterbury, Connecticut, a hazardous waste storage facility, and I, _____, P.E., employed by _____ certify by means of our signatures, that the facility named above has been closed in accordance with the method specified by the Closure Plan and as attached hereto. Closure was completed on _____, after receiving the final volume of of material on _____.

_____	_____ P.E.
Company Name	Engineer
_____	_____
Date	Date

TABLE 1

CLOSURE SCHEDULE
HAZARDOUS WASTE STORAGE
LAGOON

MR&P, INC.
WATERBURY, CONNECTICUT

CLOSURE ACTIVITY	DATE COMPLETED
1. Receipt of final volume of Hazardous Waste	July 11, 1984
2. Removal of Standing liquids (if any) and sludge	January 16, 1984 to July 12, 1984
3. Equipment Decontaminated sludge and soil removed and disposed of at a secure landfill	July 12, 1984
4. Earthwork	July 16, 1984
5. Completion of Closure	July 30, 1984

TABLE 2

Closure Cost Estimate
Hazardous Waste Storage
Lagoon

MP&P, INC.
WATERBURY, CT

CLOSURE ACTIVITY		COST
Metal Hydroxide Sludge/ Contaminated Soil Removal (280 c.y.)		$68,950.00
Backfilling (280 c.y.)		$ 2,240.00
Paving (1200 s.f.)		$ 2,000.00
		$73,190.00
	Connecticut Tax:	5,489.00
	Contingency 20%:	$14,638.00
		$93,317.00

2

CERTIFICATION OF SURFACE IMPOUNDMENT CLOSURE

M P & P INCORPORATED

I, Richard A. Dupont, for M P & P Incorporated, 346 Huntingdon Avenue, Waterbury, Connecticut, a hazardous waste storage facility, and I, Mark C. Possidento, P.E., employed by HRP Associates, Inc. certify by means of our signatures, that the facility named above has been closed in accordance with the method specified by the Closure Plan. Closure was completed on July 30, 1984, after receiving the final volume of material on July 11, 1984.

Richard A. Dupont
Company Name

3/18/85
Date

Mark C. Possidento P.E.
Engineer

STATE OF CONNECTICUT MARK C. POSSIDENTO REGISTERED PROFESSIONAL ENGINEER

3/15/85
Date

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

October 30, 1985

APPROVAL

Mr. Richard DuPont
Mirror, Polishing & Plating, Inc.
364 Huntingdon Avenue
Waterbury, Connecticut 06708

RE: Approval of Closure Plan for Surface Impoundments
Mirror, Polishing & Plating, Inc. - CTD001166263

Dear Mr. DuPont:

The closure plan for Mirror, Polishing & Plating, Inc.'s (MP&P) hazardous waste surface impoundments dated October 25, 1984 has been reviewed by the Department of Environmental Protection. The Department has determined that this plan is consistent with Connecticut's closure plan requirements pursuant to Section 25-54cc(c)-34 of Connecticut's Hazardous Waste Management Regulations. Certification of closure by an independent registered professional engineer has been submitted to the Commissioner. I hereby approve the closure plan with the following condition:

1. Groundwater monitoring must continue in accordance with the plan to be submitted to comply with Administrative Order No. HM-286 for up to 30 years. Annually the monitoring results will be reviewed and upon a determination by the Commissioner of Environmental Protection that the monitoring demonstrates that the facility has been properly decontaminated, the requirement to monitor groundwater will be waived.

This approval does not relieve the facility of the obligation to obtain any other authorization as may be required by other provisions of the Connecticut General Statutes, or regulations of Connecticut State Agencies.

Very truly yours,

S. W. Hitchcock

Stephen W. Hitchcock
Director
Hazardous Materials Management Unit

SWH:JG:et

Phone:
165 Capitol Avenue • Hartford, Connecticut 06106

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

10-3 85

CELEBRATE CONNECTICUT 350 YEARS 1985&1986

STATE OF CONNECTICUT
vs.
MIRROR POLISHING AND PLATING, INC.

IN THE MATTER OF AN ORDER TO MIRROR POLISHING AND PLATING, INC., TO ABATE POLLUTION.

Having found that Mirror Polishing and Plating, Inc., located at 364 Huntingdon Avenue, Waterbury, Connecticut, is in violation of Connecticut's Hazardous Waste Regulations and is maintaining a facility or condition which can reasonably be expected to create a source of pollution to the waters of the State of Connecticut, under the provisions of Chapter 446k of the Connecticut General Statutes as amended, the Commissioner of Environmental Protection, acting under Sections 22a-6, 22a-432 and 22a-449 of the General Statutes, hereby orders Mirror Polishing and Plating, Inc., to take such action as is necessary to:

1. Investigate the rate, extent and degree of groundwater, surface water, and soil contamination resulting from chemical storage, handling, and disposal activities.

2. Implement remedial actions to control, minimize or eliminate, to the extent necessary to protect human health and the environment, the contamination resulting from chemical storage, handling and disposal activities.

Mirror Polishing and Plating, Inc., is further ordered to accomplish the above described program, except as may be revised by the Commissioner of Environmental Protection, in accordance with the following schedule:

A. On or before October 31, 1985 verify to the Commissioner of Environmental Protection that a qualified consultant has been retained to perform the necessary studies under Directive 1 above.

B. On or before December 31, 1985, submit for review and approval of the Commissioner of Environmental Protection a scope of study report that details the proposed groundwater, surface water and soil sampling program to be developed to determine the rate, extent and degree of contamination as required under Directive 1.

Phone:
165 Capitol Avenue • Hartford, Connecticut 06106

C. On or before March 31, 1986, verify to the Commissioner of Environmental Protection that groundwater monitoring wells have been installed and that the proposed sampling program has begun in accordance with the plan approved under Step B.

D. On or before May 31, 1986, submit for review and approval of the Commissioner of Environmental Protection, a comprehensive hydrogeologic and engineering report which defines the rate, degree and extent of groundwater contamination and establishes, as necessary, a specific remedial action program that minimizes soil and groundwater contamination to the satisfaction of the Commissioner. 2/28/87

E. On or before July 31, 1986, submit for review and approval of the Commissioner of Environmental Protection contract plans and specifications for the facilities and/or procedures as defined in Step D. 4/30/87

F. On or before, September 30, 1986, verify to the Commissioner of Environmental Protection that remedial actions approved under Step E have been initiated. 6/30/87

G. On or before November 30, 1986 verify to the Commissioner of Environmental Protection that the remedial actions approved under Step E have been completed. 9/30/87

Entered as an Order of the Commissioner of Environmental Protection the third day of October, 1985.

Stanley J. Pac
Commissioner

Order No. HM-286
City of Waterbury
City of Waterbury Land Records

SJP:JG:jka